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APR 18 2022

CLERK, U.S. DISTRICT COURT
ST. PAUL, MNUNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTATamara Brown
Pro Se

Plaintiff(s),

Case No.

(To be assigned by Clerk of District Court)

22cv982 NEB/BCT

vs.

Mitchell Hamline Law School

Barbara Colombo Attorney and Director Healthcare
Seth Whitelaw Attorney and
Ashton Boone Attorney / Mayo Cl

DEMAND FOR JURY

TRIAL Instructor

YES ☒ NO ☐

Defendant(s).

Trial yes ☒

(Enter the full name(s) of ALL plaintiffs and defendants in this lawsuit. Please attach additional sheets if necessary.)

COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name

Street Address

County, City

State & Zip Code

Telephone Number

Tamara Brown (Please use P.O. Box Address)

211 Rosemary Drive # 2

DeSoto County Southaven

Mississippi 38671

901-585-3651

tbrown3@cbu.edu

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

SCANNED

APR 18 2022

U.S. DISTRICT COURT ST. PAUL

a. Defendant No. 1

Name

Street Address

County, City

State & Zip Code

Barbara Colombo

875 Summit Avenue

Saint Paul

Minnesota 55105

b. Defendant No. 2

Name

Street Address

County, City

State & Zip Code

Seth Whitelow

875 Summit Avenue

Saint Paul

Minnesota 55105

c. Defendant No. 3

Name

Street Address

County, City

State & Zip Code

Ashton Boone

875 Summit Avenue

Saint Paul

Minnesota 55105

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g., Additional Defendants 2.d., 2.e., etc.)

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a

diversity of citizenship case.

3. What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal Question

☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name:

N/A

State of Citizenship:

Defendant No. 1:

State of Citizenship:

Defendant No. 2:

State of Citizenship:

Attach additional sheets of paper as necessary and label this information as paragraph 5.

Check here if additional sheets of paper are attached. ☐

6. What is the basis for venue in the District of Minnesota? *(check all that apply)*

G Defendant(s) reside in Minnesota ☒ G Facts alleged below primarily occurred in Minnesota

G Other: explain

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7.

Violation of Fair Labor and Standards Act and Title VII Americans with Disabilities Act of 1973
Please View Complaint

Attached Document

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

Tamara Brown would like damages in the form of a job as a Compliance Officer whos salary ranges from \$60,000 to \$129,000 annually.

Date:

Signature of Plaintiff

Tamara Brown

Mailing Address

P.O. Box 383064
Germantown, TN
38183

Telephone Number

901-585-3651

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.

THE UNITED STATES DISTRICT COURT OF MINNESOTA

Tamara Brown

Pro-Se

Vs.

Mitchell Hamline Law School

Barbara Colombo Attorney and Director Healthcare Compliance

Seth Whitelaw Attorney and Instructor

Ashton Boone Attorney Mayo Clinic and Instructor

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ST. PAUL, MN

Federal Law

Title VII states that it is unlawful to discriminate against someone based on the basis of race, color, national origin, sex, or religion. It is also unlawful to retaliate against a person because the person complained about discrimination, filed a charge of discrimination, or participated in an employment discrimination investigation or lawsuit.

Title VII prohibits not only intentional discrimination, but also practices that have the effect of discriminating against individuals because of their race, color, national origin, religion, or sex.

Under Title VII, it is unlawful to discriminate in any aspect of employment, including:

- Hiring and firing;
- Compensation, assignment, or classification of employees;
- Transfer, promotion, layoff, or recall;
- Job advertisements and recruitment;
- Testing;
- Use of company facilities;
- Training and apprenticeship programs;
- Retirement plans, leave and benefits; or
- Other terms and conditions of employment.

Discriminatory practices under Title VII also include:

- Harassment on the basis of race, color, national origin, sex (including pregnancy, sexual orientation, and gender identity) or religion;
- Refusal or failure to reasonably accommodate an individual's sincerely held religious observances or practices, unless doing so would impose an undue hardship on the operation of the employer's business;
- Employment decisions based on stereotypes or assumptions about the abilities, traits, or performance of individuals of a certain race, color, national origin, sex (including pregnancy, sexual orientation, and gender identity), or religion;

- Denial of employment opportunities to an individual because of marriage to, or association with, an individual of a particular race, color, national origin, sex (including sexual orientation and gender identity) or religion; and
- Other employment decisions based on race, color, national origin, sex (including pregnancy, sexual orientation, and gender identity) or religion.

Title VI, Civil Rights Act of 1964 states no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

The FLSA Fair Labor and Standards Act and Title VII governs how employees pay their workers, and Title VII prohibits discrimination and harassment of employees of the workplace. When an intern brings suits against their employer for failing to pay wages that means the employee is protected under Title VII and Section 604 as well.

The Americans with Disabilities Act of 1973 and Section 504 provided the first federal legal protection for individuals with disabilities. This means that professors, administrators, and other school officials are aware of post-secondary education, decrees that no otherwise qualified individual with a disability shall solely by reason of his disability be excluded from participation in, be denied benefits of or subjected to discrimination under any program or activity receiving Federal Financial Assistance (29 U.S.C.A sec. 794).

Complaint

Tamara Brown is Pro-Se in this case and is a resident of DeSoto County in Southaven, MS. Tamara Brown receives mail at PO Box 383064 Germantown, TN 38183. Tamara Brown attends Mitchell Hamline School of Law as a virtual Healthcare Compliance Student. Mitchell Hamline School of Law is located at 875 Summit Avenue, Saint Paul, Minnesota 55105. Tamara Brown is being blacklisted.

Deliberate Indifference

Mitchell Hamline School of Law markets the Healthcare Compliance Certification to working professionals as a way to attain jobs in the Healthcare Compliance Sector. The Healthcare Compliance Associations (HCCA) list three ways to sit for the Compliance Certification Exam. One is to gain work experience in the area field in Health Care Compliance. The second, is to attend law schools which charge tuition rates in the thousands of dollars per credit hour which then one class can cost \$2000.00 or more. The HCCA also offers webinars and Virtual Conferences that are about \$300.00 to \$3000.00 per conference. The marketing in these programs are geared around jobs in the Healthcare Compliance Sector which pay well. Mitchell Hamline School of Law initially wanted me to take out a loan to pay for the classes which was about \$12,000.00 for four classes. I told them I would pay out of pocket for what I hoped would be a good program. Also, Barbara Colombo did not want me to obtain the internship because I would be working within directly with a Practicing Attorneys and the hours I would gain

Practical Law Experience which could be applied to a law apprenticeship that would make me eligible to sit for the Board of Bar Examiners for States such as California, Washington, where you can sit without having a Juris Doctorate.

Deliberate Indifference

I also had completed a Master's of Science Degree in Healthcare Administration. I applied for a Federal Internship for Healthcare Compliance which included a lengthy application and required online modules which discussed the government internship program. The Veterans Administration offers Training Programs called Associate Health Education which provides on-the job training in 60 Health Professions to include Nurses, Dentist, Physicians as well as Healthcare Administration and Healthcare Compliance. The Council on Higher Education and the U.S. Department of Education list Hamline University as accredited and Hamline University is Connected with Mitchell Hamline School of Law. I submitted an application to the Veterans Administration and completed On-Boarding within the Talent Management System called TMS to include trainings in Core Values, VA I Care, Taking a Military History from Patients, VHA, VBA, NCA, Military Sexual Trauma, also Patient Care/Customer Server. I contacted several hospitals and was offered an On-the Job Training Internship at the Denver Veterans Hospital with Compliance Officer Diana Russell. I also communicated with Barbara D'Arcy. Barbara Colombo was sent the paperwork which was a Standard Affiliation Agreement and would not sign the documents for me to begin training. Barbara Colombo knows that the Healthcare Compliance Association whom her college is affiliated with list Work Experience as a means to qualify for taking the Healthcare Compliance Certification Test. Barbara Colombo tells Tamara Brown to keep looking for training opportunities in an email but also denied training by not signing off on paperwork. Diana Russell wanted to mentor Tamara Brown but Barbara Colombo denial of the Affiliation Agreement Contract caused Tamara Brown to loose on the job training and networking opportunities.

Violation of Title VI

There are over million international students enrolled in American Colleges and Law Schools were an Affiliation Agreement called a HB1-Visa which allows these students from other countries to matriculate into Professional Programs. Mitchell Hamline School of Law denied my right to obtain training is clearly discriminatory and violates Title VI Civil Rights Act of 1964 and the Executive Order 11247 which allowed Black Women and Men training and job opportunities when before these citizens were denied these opportunities. The need for on the job training is because it provides the participant with realistic practice. The opportunity for training at the Denver Veterans Hospital provides the most realistic conditions in healthcare compliance with actual job conditions. We have this training because many workers have trouble transferring skills from one situation to another. Specific training is better and helps you to relate classroom learning to real-life practice. The Healthcare Compliance Certification has majority white students who work for the government and get portions of their training paid for and I who am black do not have such a position in Healthcare Administration even though I have a degree and must pay for my tuition and fees for the Certification out of my own pocket.

Violation of the Buckley Amendment

Mitchell Hamline has violated the Buckley Amendment which is a federal law that was created in November 1974 as part of the Family Educational and Privacy Act (FERPA). The amendment requires that schools to include colleges and universities provide an administrative process for students to challenge and request information in the education record that may be inaccurate, misleading, or inappropriate documents such as tests scores, comments, grades on reports or assignments. Barbara Colombo, Ashton Boone, and Seth Whitelaw have all discriminated against me with unfair grading based on a professor's opinion or other factors such as retaliation because of the denial of affiliation agreement and internship opportunity. I requested all comments and rubric be posted for my viewing and Barbara Colombo did not include a grading rubric with my final exam for my first course Healthcare Compliance Governance and Ethics 3023 Fall2021. In my next course Healthcare Compliance Institute which I took with Ashton Boone and again I requested that comments and grading rubric be posted to Canvas for viewing.

Ashton Boone has not posted my exam final with grading rubric and comments just a score was posted to Canvas. As a student at Mitchell Hamline Law School, I have contacted the school due to errors on my canvas page on several occasions. I think that the Healthcare Compliance Program is not monitoring CANVAS and checking for errors. A grade dispute can arise from four errors to include a technical error in grading-if a test was improperly scored, a test question was unfair or unclear, or you believe the grade was mistakenly entered; the grade was assigned arbitrarily-meaning the professor gave a student a grade without any reason or system of evaluation; the grade was capricious-this means that the professor assigned a grade based on other factors outside of course performance; discrimination-unfair grading based on a professors opinion or other factors that were not based on course performance. These are reasons for making sure that rubrics are attached with the virtual assignment and comments are as well. Seth Whitelaw hurled insults regarding my internal audit report instead of grading my paper with real comments on how I can structure my documents in a manner that will show how an audit is prepared and presented to government agencies. I asked for the grading rubric for the assignment graded by Seth Whitelaw. On April 6, 2022 Instructor Seth Whitelaw and Barbara Colombo began a Group Presentation that should have started at 6:30 pm Central Standard Time and pushed it back an hour to 7:30 pm Central Standard Time with no regard to time, student prior engagement and work responsibilities. During my presentation, I asked if they could hold questions until the question and answer portion of the presentation. After, the presentation the pair began to say that I should not have made the statement. Whitelaw began to present his opinion regarding a Drug Diversion case for which he stated that the Drug Enforcement Agency form 106 should not be completed within the first 24 hours, but I had stated that the Federal Law required the Drug Enforcement Agency Form 106 be completed within first 24 hours of the Diversion which is the correct procedure. I did state to them both that instruction requires Professional Acumen and not an Instructors Opinion of how to handle a situation.

REQUEST FOR RELIEF

Barbara Colombo denied Tamara Brown employment opportunities as a Compliance Officer Intern which leads to Compliance Officer jobs. Barbara Colombo denied Tamara Brown networking opportunities. Tamara Brown would like damages in the form of a job as a Compliance Officer whose salary ranges from \$60,000.00 to \$129,000.00 annually. Also damaging caused to career in the Healthcare Field due to not being able to network for possible advancement opportunities.

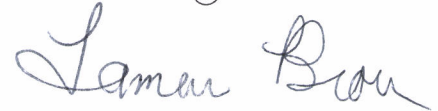
Date: April 12, 2022

Tamara Brown

PO Box 383064

Germantown, TN 38183

Tbrown3@cbu.edu

A handwritten signature in cursive script that reads "Tamara Brown".